

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

JESSICA NIESEN

Case No. 1:21-389

Plaintiff,

HON. PAUL M. MALONEY

v

MICHAEL FORT

Defendants.

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**STIPULATION AND ORDER TO EXTEND EXPERT REPORT DATES**

The parties hereto by their respective counsel who hereby stipulate to extend the dates for expert report dates for the following reasons:

1. Discovery closes February 8, 2022. [Case Management Order, ECF No.12, PageID.44].
2. Parties are seeking this extension to allow for additional time to obtain Plaintiff's psychological records under subpoena. The parties recently submitted a stipulated protective order to facilitate the same. [ECF No. 21, PageID.64].

3. The parties stipulate and agree that moving the expert report due dates to thirty days before the close of discovery is in the interest of justice.
4. This is the first request for modification of the case management order.

Date: November 9, 2021

/s/ Heather Glazer with permission  
Heather Glazer (P54952)  
Robert Giroux (P47966)  
Attorneys for Plaintiff

Date: November 9, 2021

/s/ Kristen Rewa  
Allan Vander Laan (P33893)  
Kristen Rewa (P73403)  
Attorneys for Defendant

**ORDER**

**IT IS HEREBY ORDERED** for the reasons set forth above that the dates for expert report dates shall be extended as follows:

All Expert Reports to be due by January 7, 2022; and

All Rebuttal Reports to be due by January 21, 2022.

**IT IS SO ORDERED**

November 9, 2021

/s/  
Paul L. Maloney  
District Court Judge